

UNITED STATES DISTRICT COURT

for the

Northern District of Ohio

United States of America

v.

Patricia Marie MULLINS

Case No.

Defendant(s)

FILED
RICHARD W. HAGEMAN
CLERK OF COURT
2018 JUL 30 AM 11:55U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
WESTERN DIV. DAYTON
3:18 mj 540

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 7/28/2018 in the county of Montgomery in the
Southern District of Ohio, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. §§ 841(a)(1) & (b)(1)(B)

possession with intent to distribute 50 grams or more of methamphetamine

21 U.S.C. § 856(a)

opening or maintaining a place for the use or distribution of controlled substances

18 U.S.C. § 922(g)(1)

felon in possession of a firearm

This criminal complaint is based on these facts:

See Attached Affidavit of Kathleen M. Boyce

☒ Continued on the attached sheet.

Kathleen M. Boyce

Complainant's signature

Kathleen M. Boyce, SA of HSI

Printed name and title

Sworn to before me and signed in my presence.

Date:

7-30-18

City and state:

Dayton, Ohio

Sharon L. Ovington

Judge's signature

Sharon L. Ovington, US Magistrate Judge

Printed name and title

FACTS

FACTS SUPPORTING PROBABLE CAUSE

1. Unless otherwise noted, when I assert that a statement was made, I received the information from a law enforcement officer who provided the information to me, either verbally or in a written report. The officer providing me with the information may have received the information by way of personal knowledge or from another source.
2. On July 28, 2018, at approximately 1103 hours, a Montgomery County Sheriff's Office (MCSO) Deputy was conducting routine patrol in the area of 5407 Edgewater Drive, Harrison Township, OH 45414, in search of a stolen vehicle. While doing so, the deputy observed a subject later identified as Darrell JONES, sitting in a 2008 Chrysler 300, bearing OH Registration HLX9539. The deputy observed Jones smoking a marijuana pipe while inside the vehicle, and the deputy could smell a strong odor of burnt marijuana.
3. Based upon the deputy's observations, he approached the vehicle and immediately observed a loaded .45 caliber magazine inside. The deputy instructed Jones to exit the vehicle while he investigated the situation. As Jones exited the vehicle, the deputy observed a Tupperware container containing suspected methamphetamine sitting on the seat of the vehicle. Officers searched the vehicle under the automobile exception and discovered, among other items: bulk amounts of methamphetamine weighing in excess of 50 grams, a digital scale, and a Star Pistol, S.A. Based on training and experience as well as publicly available information, I know that Star Pistols are manufactured in Spain. I also know that, based on a review of records, Jones has several misdemeanor convictions for drug usage type crimes. Based on the foregoing, I believe that Jones is an unlawful user of, or addicted to, illegal controlled substances.

4. In a post-Miranda interview, Jones told the deputy that the gun and that some methamphetamine located inside the vehicle belonged to him, but the driver of the vehicle was "Tony", who was located somewhere on the property, and the remainder of the drugs were "Tony's".
5. Based upon JONES' statements, the deputy approached a white Cirrus Camper, VIN # 5L4TC212786034132, located at 5407 Edgewater Drive, Harrison Township, OH 45414, in an attempt to speak with "Tony" about the narcotics located inside the vehicle. The deputy observed a sign on the camper that read "OPEN"; however, the door appeared locked. The deputy then looked through the camper window and observed a white male laying on the floor who appeared lifeless and did not respond to commands.
6. Based upon his observations and fear that the male had suffered a drug overdose or was in need of immediate medical attention, the deputy requested a medic and forced entry into the camper. Upon entry, the deputy observed a female laying where the motionless male had been. She was secured and identified as Jennifer Bryant. The deputy also observed a sawed-off barrel shotgun and drug paraphernalia in plain view.
7. Deputies escorted Bryant out of the camper as officers continued to announce their presence and order anyone inside the camper to come out, to which there was no response. As officers moved through the camper, they located three individuals intertwined together in the fetal position in a small bunk. Two of the individuals, later identified as Patricia Marie MULLINS and Dustin James VANWEY, acted as if they were asleep. The third individual, the male previously observed on the floor on the camper, was semi-conscious and had difficulty speaking. MULLINS and JONES identified that individual as "Tony", who was later identified as Roger Anthony BRASSFIELD. BRASSFIELD was in possession of a large sum of money and the keys belonging to the Chrysler 300 located outside of the camper.
8. The deputy contacted members of the Miami Valley Bulk Smuggling Task Force (MVBSTF) and Regional Agencies Gun and Narcotics Enforcement (RANGE) Task Force to assist in the investigation.

9. A short time later, a detective and member of the RANGE Task Force responded and conducted an interview of MULLINS. Prior to the interview, the detective advised MULLINS of her Miranda Rights. MULLINS voluntarily waived those rights and agreed to speak with the detective.
10. MULLINS stated she was the owner of the camper and had purchased it sometime in May or June 2018, for \$1,300 in cash from "Let Go", and had been living in the camper since that time. MULLINS stated there was marijuana and weapons inside, to include a semi-automatic handgun which MULLINS obtained for protection. I have reviewed records for MULLINS and learned that she had convictions in the Darke County, Ohio Court of Common Pleas for drug trafficking (F4) and Prebble County, Ohio, Court of Common Pleas for illegal possession of chemicals for assembly of drugs (F3), both of which are punishable by a term of imprisonment exceeding one year.
11. The detective also conducted an interview of VANWEY. Prior to the interview, the detective advised VANWEY of his Miranda Rights. VANWEY voluntarily waived those rights and agreed to speak with the detective.
12. VANWEY stated he arrived at the camper at approximately 10:00am and was binging on methamphetamine. He also stated he had been released from prison the previous Saturday, July 21, 2018. I have reviewed convictions documents concerning VANWEY and learned that his convictions in the Montgomery County, Ohio Court of Common Pleas for, among other things, illegal conveyance of drugs onto the grounds of a detention facility (2013), a crime punishable by a term of imprisonment exceeding one year.
13. The detective conducted an interview of Bryant. Prior to the interview, the detective advised Bryant of her Miranda Rights. Bryant voluntarily waived those rights and agreed to speak with the detective.
14. Bryant stated she received a text message from VANWEY inviting her to the camper. Upon arrival at the camper, Bryant stated VANWEY, MULLINS, and BRASSFIELD were inside, and she observed a handgun inside the camper. Bryant further stated when

deputies arrived at the camper, VANWEY retrieved the handgun and moved it to the front of the camper.

15. Record checks were conducted indicating the camper was stolen on June 6, 2018, from Korreect Storage, located at 40 N. Snyder Road, Trotwood, OH, 45427.
16. A detective and member of the MVBSTF who was also assisting in the investigation obtained a search warrant for the camper from the Montgomery County Court of Common Pleas.
17. Officers subsequently conducted a search of the camper and located a sawed-off shotgun, Springfield Model 67, Serial Number B045616, in front of the door in plain view, a Glock 17 handgun, Serial Number AW232US and H&R revolver, Serial Number AR68200 inside a cabinet, and a RG 23 revolver, Serial Number 234777, located under the mattress of a bed. I know that none of the aforementioned firearms are manufactured in Ohio and therefore moved or shipped in interstate commerce to reach this state. Officers also located a camouflage bag on the couch inside the camper and discovered an estimated 342 grams of a mixture containing white powder and a crystal-like substance inside the bag, as well as a large amount of U.S. Currency. Officers conducted a field test of the white powder mixture resulting in a positive result for the presence of methamphetamine.

18. Based on the facts set forth in this Affidavit, Your Affiant believes there is probable cause to issue a criminal complaint and arrest warrants against Darrell JONES, Roger Anthony BRASSFIELD, Patricia Marie MULLINS, a/k/a Patricia Marie Vanwey, and Dustin James VANWEY, for the above-described offenses.

Kathleen M. Boyce

Kathleen M. Boyce, Special Agent
Homeland Security Investigations

Subscribed and sworn to before me on July 30, 2018

Sharon L. Ovington

Honorable Sharon L. Ovington
United States Magistrate Judge